

REMARKS / ARGUMENTS

Applicants respectfully request reconsideration of this application in view of the following remarks.

PREFACE

Applicants as early as the first office action response, 5/27/2005 detailed in excruciating detail the distinction between what Applicants are claiming and stylesheets. The Examiner for some reason continues to equate stylesheets with what Applicants are claiming. Applicants again reiterate they are different. IN FACT WHAT APPLICANTS CLAIM HAS NO USE OF STYLESHEETS.

Applicants hereby incorporate by reference in its entirety Applicants' Office Action response of 5/27/2005. Applicants respectfully request the Examiner review this to see the difference between stylesheets and what Applicants have claimed.

Discussion of Cited Art

The Examiner has previously cited Ali every time (4 times) for rejection, either singly or in view of other art.

The latest is in view of Li (US 6,799,299). Li's title is "Method and apparatus for creating stylesheets in a data processing system." (Emphasis added.) Li is another reference to stylesheets which is not relevant. Stylesheets are not what Applicants are claiming.

The distinctions with respect to Ali in view of Li are many, briefly:

Firstly, Ali and Li convert documents; in contrast, Applicants' invention does not convert any documents.

Secondly, Applicants' invention has no use of style sheets. (Applicants' display-spec are NOT the same as style-sheets.)

Thirdly, Li uses 'visual' conversion (see block 300). There is NO 'visual' conversion in Applicants' invention.

Fourthly, there is NO creation of stylesheets in Applicants' invention.

Fifthly, Applicants' invention does NOT involve 2 documents; it is about editing an instance of an XML. Editing an XML is NOT the same as transforming a document.

Sixthly, in the example cited in the Li patent, the source document happens to be an XML and the destination is an HTML. One has to know the HTML prior to writing/generating the transformation rules. Applicants' invention has no such restriction.

Seventhly, the Li patent is about "Visually creating transformation rules" so that it is easy to generate a prior known destination document. Applicants' invention has no such restriction.

Eighthly, the Li patent requires usage of an "external" editor to further modify the stylesheet to generate destination document. This is not even applicable in the case of Applicants' invention.

For all these reasons, Ali even in view of Li fails to make obvious what Applicants have claimed.

Claims Rejections - 35 USC § 103(a) – Ali in view of Li

The Office at 4 states:

4. Claims 1-3, 5-51, 53-58 rejected under 35 U.S.C. 103(a) as being unpatentable over Ali et al ("Ali", WO 01/44932) in view of Li et al ("Li", US 6799299).

Claim 1 Rejection - 35 USC § 103(a) – Ali in view of Li

The Office at 4¶1 states:

As per independent claim 1, Ali discloses a method comprising: receiving a schema having elements (Ali, Figure 4A item 410); receiving an instance related to said schema (Ali, Figure 4A item 414); receiving a display specification (Ali, Figure 4A item 412); and generating a display (Ali, Figure 4A item 424).

(Emphasis and line breaks added)

Ali does not distinctly point out a display specification having rules for schema elements, and generating a display based on the schema elements and the display specification rules. **However, Li teaches receiving a schema for any XML instance (Column 6 lines 19-29); ...Therefore it would have been obvious**

(Emphasis added.)

Column 6 lines 19-29 state:

To understand the operation of the stylesheet generation process in detail, an example stylesheet generation is presented in the discussion of FIGS. 7-15. The process begins with an XML document that the user wants to transform into another document type. To automate this process for any number of similarly-structured XML documents, the user wants to create an XSL stylesheet. Once the stylesheet is developed, any XML document conforming to the original Document Type Definition (DTD) may be automatically converted to the desired document type by applying the stylesheet. (Emphasis added.)

Li discloses "any number of similarly-structured XML documents". Li does not disclose "receiving any XML (extensible markup language) instance" as Applicants have claimed. Similarly-structured (Li) is not the same as any (Applicants).

Ali does not disclose this limitation. Ali works only with very specific XML data that describes the UI (user interface), and is not actual user-data. Additionally, the Ali patent cannot work with "ANY" schema. Ali works with specific schema which is geared towards specifying displays (see as an example on page 23 under Control Panel XML Schema Document).

Therefore Ali in view of Li does not make obvious Applicants' claim 1. Applicants respectfully request removal of the rejection for claim 1, and allowance for claim 1 and claims 2-3, and 5-19 which are dependent on claim 1.

Claims 20, 38, 49, and 58 Rejection - 35 USC § 103(a) – Ali in view of Li

As noted in the discussion above, Ali in view of Li does not make obvious Applicants' independent claim 1. Independent claims 20, 38, 49, and 58 for similar reasons as discussed above are not obvious in light of Ali in view of Li. As discussed above Ali in view of Li does not disclose handling any XML data. Applicants respectfully request removal of

the rejection for claims 20, 38, 49, and 58, and allowance for claims 20, 38, 49, and 58; and for claims 21-37, and 39-48, and 50, 51, 53-57 which are dependent on claims 20, 38, 49 respectively.

Claims 2-3, 5-19, 21-37, 39-48, and 50, 51, 53-57 Rejection - 35 USC § 103(a) – Ali in view of Li

As noted in the discussion above, Ali in view of Li does not make obvious Applicants' claims 1, 20, 38, and 49 upon which claims 2-3, 5-19; 21-37; 39-48; and 50, 51, 53-57 are dependent respectively and inherit the limitations of claims 1, 20, 38, and 49 respectively. Therefore, Ali in view of Li does not make obvious Applicants' claims 2-3, 5-19; 21-37; 39-48; and 50, 51, 53-57. Additionally, claims 2-3, 5-19; 21-37; 39-48; and 50, 51, 53-57 each have additional limitations that are not made obvious in light of Ali in view of Li. Applicants respectfully request removal of the rejections and allowance for claims 2-3, 5-19; 21-37; 39-48; and 50, 51, 53-57.

Claims 4 and 52 Rejection - 35 USC § 103(a) – Ali in view of Li

The Office at 5 states:

5. Claims 4 and 52 are rejected under 35 U.S.C. 103(a) as being

unpatentable over Ali et al ("Ali", WO 01/44932) in view of Li et al ("Li", US 6799299).

Claim 4 Rejection - 35 USC § 103(a) – Ali in view of Li

The Office at 5¶1 states:

As per claim 4, which is dependent on claim 3, Ali-Li fails to expressly point out type checking and structural validation. However, Official Notice is taken that type checking and structural validation are well known in the art of XML schemas. Type checking adds overhead, but if data accuracy and integrity is important, then using DTDs alone is not very helpful, thus the use of XML schemas in the current invention. Therefore it would have been obvious to an artisan at the time of the invention to combine the method of Ali-Li with the current teaching of type checking. Motivation to do so would have been to provide accurate information.

Applicants contest the Official Notice with respect, as discussed above to the aspect with regard to any XML data. As noted above the Ali-Li combination fails to make obvious Applicants' claim 1 upon which claim 4 is dependent. Therefore Ali in view of Li fails to make obvious claim 4. Additionally, claim 4 has further limitations that are not made obvious in light of Ali in view of Li. Applicants respectfully request removal of the rejection for claim 4, and allowance for claim 4.

Claim 52 Rejection - 35 USC § 103(a) – Ali in view of Li

The Office at 5¶2 states:

As per claim 52, which is dependent on claim 49, Ali-Li fails to disclose transferring a payment and/or a credit. However, Official Notice is taken that transferring a payment and/or a credit is well known in the art. Online transactions have been taking place for a long time, online transactions reduce the need for extra employees and allows for faster transactions because there is no need for waiting for checks to clear before the product is shipped for example. Therefore it would have been obvious to an artisan at the time of the invention to combine the system of Ali-Li with the current teaching of transferring payments. Motivation to do so would have been to provide a faster way of doing business.

Applicants contest the Official Notice with respect, as discussed above to the aspect with regard to any XML data. As noted above the Ali-Li combination fails to make obvious Applicants' claim 49 upon which claim 52 is dependent. Therefore Ali in view of Li fails to make obvious claim 52. Additionally claim 52 has additional limitations that are not made obvious in light of Ali in view of Li. Applicants respectfully request removal of the rejection for claim 52, and allowance for claim 52.

CONCLUSION

Applicants submit that any claim not directly discussed is addressed via the independent claim discussion on which it is dependent.

Applicants respectfully submit that all claims are in condition for allowance, and request allowance of all claims.

The Examiner is invited to call Alan Heimlich at 408 253-3860 if there remains any issue with allowance. Cleartext email communication is authorized.

Respectfully submitted,

Heimlich Law



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